

1 Matthew G. Ball (SBN: 208881)
2 matthew.ball@klgates.com
3 **K&L GATES LLP**
4 Four Embarcadero Center, Suite 1200
5 San Francisco, CA 94111
6 Tel.: (415) 882-8200
7 Fax: (415) 882-8220

8 Irene C. Freidel (*pro hac vice*)
9 irene.freidel@klgates.com
10 David D. Christensen (*pro hac vice*)
11 david.christensen@klgate.com
12 **K&L GATES LLP**
13 State Street Financial Center
14 One Lincoln Street
15 Boston, MA 02111-2950
16 Tel.: (617) 261-3100
17 Fax: (617) 261-3175

18 Attorneys for Defendant Wells Fargo Bank, N.A.
19

20 **UNITED STATES DISTRICT COURT**
21
NORTHERN DISTRICT OF CALIFORNIA

22 KAREN LUCIA and JEFFREY LUCIA, on
23 behalf of themselves and others similarly situated,

24 Case No. 10-CV-04749-VC

25 Plaintiffs,

26 **[PROPOSED] ORDER COMPELLING
27 PRODUCTION OF PLAINTIFFS' TAX
28 RETURNS AND UNEMPLOYMENT
RECORDS**

29 v.
30 WELLS FARGO BANK, N.A. d/b/a WELLS
31 FARGO HOME MORTGAGE and DOES 1
32 through 10,

33 The Hon. Vince Chhabria

34 Defendants.

1 The Court, having read and considered the letter submitted jointly by plaintiffs Karen and
2 Jeffrey Lucia (“plaintiffs”) and defendant Wells Fargo Bank, N.A. (“Wells Fargo”), HEREBY
3 ORDERS that:

4 Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37, plaintiffs shall produce (1)
5 their complete tax returns, with schedules, for the 2009 and 2010 tax years (the “Tax Returns”) and
6 (2) documents evidencing all unemployment income received by plaintiffs in 2009 and 2010
7 (“Unemployment Records”). The Tax Returns and Unemployment Records shall be produced to
8 Wells Fargo within fourteen (14) days of the date of this order.

9 **IT IS SO ORDERED.**

10
11 Dated: March 13, 2015



12
13 The Honorable Vince Chhabria
14 United States District Judge